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July 1, 1996

Dockets Management Branch (HFA-305)  
Food and Drug Administration  
5630 Fishers Lane, Room 1061  
Rockville, Maryland 20852

7424 '99 JUL -8 P2:12

Subject: Comments for Docket No. 98N-1038,  
Irradiation in the Production, Processing, and Handling of Food

1) With respect to the issue of labeling, in its initial petition, the FDA concluded that the use of irradiation in the processing of food was a "material fact", and thus should be disclosed. This material fact remains unchanged; therefore, labeling must remain.

2) I support the recommendation by the Center for Science in the Public Interest regarding the manner of irradiation disclosure:

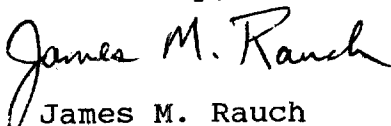
"any foods, or any foods containing ingredients that have been treated by irradiation, should be labeled with a written statement on the principal display panel indicating such treatment. The statement should be easy to read and placed in close proximity to the name of the food and accompanied by the international symbol. If the food is unpackaged, this information should be clearly displayed on a poster in plain view and adjacent to where the product is displayed for sale."

3) Like other labels, irradiation labels are required by FDA to be truthful and not misleading. I believe that the terms "treated with radiation" or "treated by irradiation" should be retained. Any phrase involving use of the word "pasteurization" is misleading because pasteurization is an entirely different process of rapid heating and cooling.

4) I recognize the radura as information regarding a material fact of food processing. The symbol should be clearly understandable at the point of purchase by every one. The requirement for irradiation disclosure, by both radura and labeling text, should not expire at any time in the future. The material fact of processing remains. While some consumers are familiar with the meaning of the radura, other consumers are not (e.g., new consumers, young people, immigrants). If there is no labeling text, some consumers will not be aware that the food has been irradiated, or even worse, may be misled into thinking that food processed by this controversial (among scientists) method is somehow better.

5) As a pharmacist whose main interest is public health, I urge you to place the comments received on the Internet so that the public will be better informed about who is participating in this comment process.

Sincerely,

  
James M. Rauch

98N 1038

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